

Eric B. Mitton, OSB 065925

Of Attorneys for Defendant City of Medford

Medford City Attorney's Office

411 W. 8th Street, Room 260

Medford, OR 97501

(541) 774-2020

richard.whitlock@cityofmedford.org

eric.mitton@cityofmedford.org

Thomas F. Armosino, OSB No. 911954

Email: Armosino@fdfirm.com

Casey S. Murdock, OSB No. 144914

Email: Murdock@fdfirm.com

FROHNMAYER, DEATHERAGE, JAMIESON,

MOORE, ARMOSINO & McGOVERN, PC

2592 East Barnett Road

Medford, OR 97504

Phone: (541) 772-2333

Fax: (541) 779-6379

Of Attorneys for Defendant City of Medford

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

MEDFORD DIVISION

ANDRE BILODEAU, ROBERT BESSY,)
AMBER MCNAB, AND GREG)
KILLINGSWORTH, individuals, on)
behalf of themselves and all others)
similarly situated; and DOES 1 through)
100,)

Plaintiffs,)

v.)

CITY OF MEDFORD, MEDFORD, an)
incorporated Oregon city,)

Defendant.)
_____)

Case No. 21-CV-00766

STIPULATED PROTECTIVE ORDER

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(541) 774-2020

The parties to this case contemplate that a significant number of police reports will be produced by Defendant's counsel to Plaintiffs' counsel during document discovery. In the interests of practicality and efficiency, the parties agree that Defendant's counsel may produce unredacted documents and reports to Plaintiffs' counsel subject to the following:

(1) The reports may only be used for purposes of litigation in the above-captioned case and not for any other purpose.

(2) Dates of birth and social security numbers on such reports shall be treated by Plaintiffs' counsel as limited to Plaintiffs' counsel and their staff (i.e., "attorneys' eyes only"). If Plaintiffs' counsel will be filing any reports with the Court or providing reports to Plaintiffs themselves, or to any third parties (including but not limited to witnesses at deposition), Plaintiffs' counsel shall redact those dates of birth and social security numbers beforehand.

(3) Any police reports stamped "juvenile" or dealing with sex crimes shall be treated by Plaintiffs' counsel as limited to Plaintiffs' counsel and their staff (i.e., "attorneys' eyes only"). Should the parties need to file such a report with the Court, the report shall be filed under seal pursuant to Federal Rule of Civil Procedure 5.2(d). This restriction applies to the whole police report unless the parties reach a different agreement as to that police report. If any report under this section is referenced, discussed, or submitted as an Exhibit at deposition or trial, such questioning and testimony shall be treated as confidential and subject to seal.


(4) In addition to Plaintiffs' counsel and their staff, the information described in (2) and the documents described in (3) may be furnished to professional expert witnesses for purposes of litigation in the above-captioned case, provided those expert witnesses (a) also are provided copies of this Protective Order, (b) agree in writing to be bound by the Protective Order, and (c)

agree to return the reports, information, and documents to counsel no later than 60 days after final resolution of the above-captioned case.

SO STIPULATED:


JUSTIN ROSAS, OSB #076412
Of Attorneys for Plaintiffs

DATED: 12/9/21


CASEY MURDOCK, OSB #144914
Of Attorneys for Defendant

DATED: 12/13/21


ERIC MILTON, OSB #065925
Of Attorneys for Defendant

DATED: 12/9/21

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This Court has reviewed the reasons offered in support of entry of this Stipulated Protective Order and finds that there is good cause to protect the confidential nature of certain information. Accordingly, this Court adopts the above Stipulated Protective Order in this action. IT IS SO ORDERED THIS ____ day of _____, 20____.

Honorable _____
United States District Court Judge

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **STIPULATED PROTECTIVE ORDER** upon:

Justin N. Rosas
justin@justinrosas.com
Justina Lara
justina@justinrosas.com
THE LAW OFFICE OF JUSTIN ROSASJU
110 W. 11th Street
Medford, OR 97501
Attorneys for Plaintiffs

Eric Mitton
City Attorney's Office
411 W 8th Street, Room 332
Medford, OR 97501
Attorneys for Defendant

☒ by automatic electronic transmission via the Court's Case Management and Electronic Case Filing system.

DATED this 13th day of December, 2021.

FROHNMAYER, DEATHERAGE, JAMIESON,
MOORE, ARMOSINO & McGOVERN, P.C.



Casey S. Murdock, OSB #144914
Murdock@fdfirm.com
Of Attorneys for Defendant